

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

UNITED STATES OF AMERICA

v.

KOLON INDUSTRIES, INC.,

Including and through its successors
“Kolon Industries, Inc.” and “Kolon
Corporation”

JONG-HYUN CHOI,

IN-SIK HAN,

JU-WAN KIM,

KYEONG-HWAN RHO,

YOUNG-SOO SEO,

Defendants.

Case No. 3:12-cr-137-AJT

KOLON’S MOTION FOR LEAVE TO APPEAR SPECIALLY

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PLEASE TAKE NOTICE that counsel for Specially Appearing Defendant Kolon¹ hereby requests that the Court grant Kolon leave to appear specially for the limited purpose of filing a motion requesting a brief continuance of the arraignment, currently scheduled for February 19, 2015, in order to allow the United States Court of Appeals for the Fourth Circuit sufficient time to act upon Kolon's petition for writ of mandamus addressing Kolon's jurisdiction challenges in this case. This Motion is made on the grounds set forth in the accompanying Memorandum.

Respectfully submitted this 10th day of February, 2015.

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¹ "Kolon" refers to Kolon Industries, Inc., Kolon Corporation and any Kolon entity that the Government contends is both a party and the subject of the Government's service efforts in the above-captioned action. The Superseding Indictment is fatally ambiguous as to the named defendant(s).

*Attorneys for Specially-Appearing Defendants
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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of February, 2015, I electronically filed the foregoing document, entitled Kolon's Motion for Leave to Appear Specially, with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel named below:

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